

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

TALITHA KINCADE BROUGHTON,	)	
	)	
	)	CAFN: 1:22-cv-04229-ELR
Plaintiff,	)	
	)	
v.	)	
	)	
	)	
WALMART, INC.	)	
	)	
	)	
	)	
Defendant.	)	

**CONSENT MOTION TO EXTEND DISCOVERY**  
**THROUGH AND INCLUDING AUGUST 31, 2023**

This is a personal injury case in which plaintiff allegedly sustained injuries following a fall at Walmart. This case is currently on a four (4) month discovery track which began on November 23, 2022 and will expire on March 23, 2023. The parties have been diligently conducting discovery for the past two (2) months with written discovery complete as well as obtaining plaintiff's deposition on January 18, 2023.

During discovery it was revealed that plaintiff sustained a workplace fall in 2009 resulting in a left shoulder injury as well as what plaintiff self-described as “sciatic nerve damage.” Plaintiff alleges left shoulder and lower back injuries from her fall in this case.

Plaintiff testified that she treated for the injuries she sustained in her 2009 fall until at least 2015. Public records have revealed that she attempted to obtain Social Security Disability benefits and income for her injuries through March of 2020. Plaintiff produced approximately 700 pages of past medical records in written discovery; however, the records end in 2016 leaving four (4) years of records for the parties to uncover. The records associated with plaintiff's treatment are located in California and potentially in Nevada.

The parties require additional discovery to obtain plaintiff's pre-fall medical records which are located in California and Nevada. The parties also need additional time to obtain plaintiff's worker's compensation file from the California Board of Worker's Compensation.

Given the overlap between plaintiff's 2009 fall and her fall in this case, the parties require additional time to complete expert discovery in order to allow for plaintiff's treating physicians to review these records and provide accurate causation testimony. Defendant will then need additional time to obtain rebuttal experts.

The parties believe they will be able to complete this discovery by August 21, 2023. This is the parties' first request to extend discovery. A proposed order is attached hereto as Exhibit A.

Jointly submitted this 23rd day of January, 2022.

WALDON ADELMAN CASTILLA  
HIESTAND & PROUT

HARRIS & HARRIS, LLC

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**CERTIFICATE OF COMPLIANCE**

On this date, the undersigned hereby certifies that the foregoing pleading complies with the font and point selections approved by the Court pursuant to Local Rule 5.1B. The foregoing pleading has been prepared in 14-point Times New Roman font.

This 23rd day of January, 2023.

WALDON ADELMAN CASTILLA  
HIESTAND & PROUT

/s/ Casey J. Brown  
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I hereby certify that, on this the 23rd day of January, 2023, I electronically filed the foregoing *Joint Motion to Extend Discovery* with the Clerk of this Court using the CM/ECF system which will automatically provide notice of such filing via electronic mail to the following attorney(s) of record:

Christopher S. Harris  
Harris & Harris, LLC  
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This 23rd day of January, 2023.

WALDON ADELMAN CASTILLA  
HIESTAND & PROUT

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